US ERA ARCHIVE DOCUMENT

| SECTION H | PERSONNEL TRAINING

H.1 OUTLINE OF TRAINING PROGRAM

A combination of documented on-the-job training and formal "classroom training" is provided for all new employees. In addition, refresher training is provided on an annual basis. See attachment H-4 for complete course outlines. Training may include the following, depending upon the requirements of the position:

- 1. Generator requirements
- 2. Labeling (EPA and DOT)
- 3. Use of manifest and manifest system
- 4 Forklift operator training
- 5. Contingency plan implementation
- 6. Spill response, SPCC and Storm Water Awareness training
- 7. Shredder operator training
- 8. Acid/base handling and treatment (as appropriate for job assignment)
- 9. Cyanide treatment (as appropriate)
- 10. Reactor operation (treatment of water reactive) (as appropriate for job assignment)
- 11. Flammable liquid handling
- 12. Grounding and bonding
- 13. Fire extinguisher training
- 14. Internal operating procedures
- 15. Respirator training
- 16. Respirator fit testing
- 17. Sampling procedures
- 18. Recordkeeping (manifests, HCT's, compatibility, lab data, profiles)
- 19. Sulfide treatment (as appropriate to job assignment)
- 20. Communications
- 21. Department of transportation regulations
- 22. Incompatible wastes- segregation and handling
- 23. Hazard communications program
- 24. NFPA warning system
- 25. Handling compressed gas cylinders including anhydrous ammonia

Training is accomplished in many different ways. New employees receive classroom instruction and are assigned to experienced employees, deemed Competent Persons, for further hands-on training.

The Industrial Commission of Ohio has presented training on the Safe Handling of Flammable Liquids, Forklift Operations, Respirator Training, and Respirator Fit Testing.

Seminars and other training sessions presented by outside organizations are used for selected employee training. Examples include the Greater Cincinnati Hazardous Material Control Committee Spill exercise, Cincinnati Chamber of Commerce seminars, American Red Cross, and various other trade organization seminars.

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Fire Extinguisher Service, which services our extinguishers and fire suppression system provides further extinguisher training.

Internal training is provided by various in house resources. Overall training is monitored by the EH&S Manager. The individual in this position must have at least five years experience in the environmental, health and safety field. Other trainers include, are not limited to, the Plant Manager (with over twenty years of experience), Quality Assurance Director (with over fifteen years of experience) and foreman with at least 3 years experience. All designated trainers are classified as a "Competent Person" by EEI as they possess the training, experience, skills and demonstrated knowledge exhibited for the applicable task.

Personnel who perform daily and weekly inspections are trained by the Plant Manager.

Training is performed by inspecting the facility with the Plant Manager. The Plant Manager reviews the inspection form instructions with the trainee as various situations are presented, such as leaning drums, aisle space problems, potential leaking drums, etc.

Employees are required to sign an attendance record to document training and completion certificate generated upon a successful proficiency assessment. See Attachment H-1 for examples.

H.1a Job Title/Job Descriptions

The job title and job description of each employee whose position at the facility is related to hazardous waste management is presented below. The training required for each position is presented in Attachment H-2.

Plant Manager

Job Description:

- Supervise all plant activities
- Ensure compliance with all safety policies and procedures
- Train new employees
- Provide refresher training
- Act as on-site Emergency Coordinator
- Ensure compliance with all TSD regulations

Qualifications and Training:

Must have Associate Degree or equivalent plus three years experience in hazardous waste. complete in-house training as required

Clerical

Job Description:

- Operate computer system
- Keep operating log
- Print bar code labels
- Print HCT tickets
- File certification letters
- Field records of compatibility testing

Qualifications and Training:

High School education required

Computer experience helpful- not necessary

Type 20 words per minute

Complete in-house training regarding recordkeeping

Quality Assurance Director

Job Description:

Supervise QA Department including

laboratory

- Obtain off-site approvals

- Ensure compliance with analysis plan

Qualifications and Training:

Associate Degree- minimum two years experience in hazardous waste industry or High School plus four years experience in hazardous waste industry including previous QA experience

Quality Assurance Technician

Job Description:

- Perform QA checks on incoming waste per analysis plan
- Resolve discrepancies
- Log in waste shipments in QA file

Qualifications and Training:

Two years college chemistry or three years experience in hazardous WASTE industry including previous QA experience.

Quality Assurance Lab Technician

Job Description:

- Perform laboratory analysis for facility operation per analysis plan
- Keep laboratory records
- Perform treatability tests

Qualifications and Training:

Associate Degree in Chemistry or Environmental Technology or similar field.

Shift General Foreman

Job Description:

- Supervise hourly employees in handling and treatment of wastes
- Ensure compliance of all employees with company policies and procedures
- Prepare shipments for off-site disposal

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Qualifications and Training!

High School education plus minimum of two years experience in hazardous waste or one year experience at EEI after completion of all training programs and procedures.

Chemical Treatment Foreman

Job Description:

 Supervise treatment of acids, bases, cyanides, oxidizers, water reactives, sulfides, acid chlorides, and solvents

Qualifications and Training:

High School education with two years of experience at EEI in all phases of waste treatment.

Must have completed extensive training in all treatment procedures.

Chemical Treatment Technician

Job Description:

- Perform treatment at the direction of Chemical Treatment Foreman.

Qualifications and Training:

High School education or GED. Completion of training to all procedures relative to treatment of which he may be assigned.

Waste Technician- General

Job Description:

- Perform various duties as back-up man at Foreman's direction.
- Unload trucks.Forklift operator
- Pump solvents

Qualifications and Training:

High School education and general chemical safety experience required.

Completed EEI classroom and on-the-job training.

Waste Technician-Solvent Reclaimer

Job Description;

 Responsible for transfer and blending of solvent wastes for fuel blending program.

Qualifications and Training:

High School education

Previous solvent handling experience or one year

H-4

September 2007 Renewal Application EEI experience required. Completed EEI training

Waste Technician- Shredder

Job Description:

Process consumer products through shredder

Qualifications and Training:

High School education required Complete EEI training program

Two months experience on-the-job training

Maintenance

Job Description:

Responsible for the repair and preventive maintenance of facility equipment

Housekeeping responsibilities of non-

hazardous waste

Qualifications and Training:

High School education required Complete EEI training program

Waste Technician-Solidifier

Job Description:

- Responsible for the preparation/fixation of waste destined for landfill disposal
- Forklift operator

Qualifications and Training:

High School education required Complete EEI training program

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H.1b Training Content, Frequency and Techniques

New employees are given introductory training (see Section H.1b(1) for content) and training specific to their job position. See Attachment H-2 for the content of training required for the various job positions. All employees receive an annual review of initial training. If an employee's job position or responsibilities change, he will receive continuing training appropriate for the new responsibilities.

Personnel Training Program

- A.1) Facility personnel must successfully complete a program of classroom instruction. Personnel assigned to operate Hazardous Waste Treatment Units are further instructed by an assigned supervisors on the operating procedures for each of the Units. The Protective Measures Determination and Job Hazard Analysis is reviewed, acknowledged and signed by the empolyee and supervisor. The on the job training continues under direct supervision until the employee is deemed to be competent to perform the operation without direct supervision. The dates of OJT are recorded on the JHA and filed in the employee training file. If change of assignment occurs the same procedure is followed for the new task. The on-the-job training teaches them to perform their duties in a safe and environmental sound manner that ensures the facility's compliance with the requirements of the State and Federal regulations. (see Attachnment H-4 for JHAs for schredder and typical operation at treatment tank as an example)
 - 2) This program is directed by a person trained in hazardous waste management procedures, and includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the position in which they are employed.
 - The training program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including:
 - Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
 - b. Communications and alarm systems;
 - c. Response to fires, explosions, or releases;
 - d. Shutdown of operations.
- B. Facility personnel must successfully complete the prescribed program within six months after the date of their employment or assignment to the facility, or to a new position at the facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements of paragraph (A) of this section. All new employees receive 40 hours classroom training prior to working in the facility.
- C. Facility personnel must take part in an annual review of the initial training, see Section H.1b(a).

- D. EEI maintains the following documents and records at the facility:
 - 1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job (see Section H-1a and Attachments H-2 and H-3);
 - 2) A written job description for each position listed under paragraph (D)(1) of this section (see Section H-1a). This is consistent in its degree of specificity with description of other similar positions and includes the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
 - 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this section (see Attachment H-2);
 - 4) Records that document that the training or job experience required under paragraphs (A), (B), and (C) of this section has been given to, and completed by, facility personnel (see Attachment H-1 and H-3).
- E. Training records on current personnel will be kept until closure of the facility.

 Training records on former employees will be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

Overall Training Objectives

Participants will, with handout material provided, be able to:

- o Identify the various work areas of the EEI facility.
- o Identify the employee assembly area following emergency evacuation.
- o Identify emergency exit routes in the event of fire or other emergency situation.
- List the agencies to be notified in an emergency.
- List and identify various "acronym" agencies.
- o Describe how chemical waste is classified and the importance of accuracy.
- Review a manifest for accuracy.
- o Utilize the DOT Emergency Response Guidebook to determine UN numbers.
- List at least five DOT hazard classes.
- Interpret the NFPA 704 standard.
- Correctly select the NFPA 704 standard.
- Select the proper personal protective equipment needed for a specific assignment.
- o Discuss how contamination occurs.
- o Comprehend and discuss company safety policies.
- Demonstrate knowledge of the MSDS.
- o Discuss the importance of accurate recordkeeping.
- Determine hazard potential of a material after reviewing chemistry data.

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 Demonstrate knowledge of the types and severity of injuries possible when dealing with hazardous materials.

H.1b(1) Initial Training Program for New Employees

See Attachment H-4 for course outline.

H.1b (2) Continuing Training

All employees receive an annual review of the initial training described above. Continuing training is provided by daily on-the-job training and experience and, as needed, additional training is provided when an employee's job position or responsibilities change. Not all of the above training is repeated annually. Annual training is determined based upon rule changes, accident record and results of employee proficiency testing on initial training subjects. Subjects for which 40% of the employees tested score less than 70% correct are repeated.

H.1c Training Director

Each training program will be under the control of a training director who is responsible for the program. The training director will have a minimum of two years of employee education experience and be deemed competent as an instructor based upon previous documented experience in the areas of instruction and successful completion of a Train The Trainer program. Instructors will be deemed as competent on the basis of previous documented experience in their area of instruction. All components of the training program will be in compliance with the requirements in 40 CFR 264.16 and 40 CFR 265.16.

New employees receive classroom instruction and are assigned to experienced Competent employees for further hand-on training.

Classroom instruction is provided by various in house instructors, details given in H-1.

H.1d Relevance of Training to Job Position

Facility personnel are instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions. See Attachment H-2 for the specific training required for the various job positions.

H.1e Training for Emergency Response

Facility personnel are able to respond effectively to emergencies and are familiar with emergency procedures, emergency equipment, and emergency systems. The training program includes the following:

- Procedures for using, inspection, repairing, and replacing facility emergency and monitoring equipment
- o Communications and alarm systems
- o Response to fires or releases
- o Shutdown of operations

Employees are also familiar with contingency plan implementation and use of PPE.

H.2 Implementation of Training Program

Facility personnel must successfully complete the prescribed program within six months after the date of their employment or assignment to EEI, or to a new position at the facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the necessary training requirements. All new employees receive 40 hours classroom training prior to working in the facility.

Records documenting that the required training has been given to and completed by facility personnel are maintained at EEI.

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Attachment

Attendance Record

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EMPLOYEE TRAINING RECORDS: REFER TO ON-SITE TRAINING RECORDS FOR EMPLOYEES

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Attachment

JII-2

Training Requirement for Job Positions Involving Hazardous Waste Management

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ATTACHMENT H-2

TRAINING REQUIREMENT FOR JOB POSITIONS INVOLVING HAZARDOUS WASTE MANAGEMENT

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	NAL YSIS		All Affected Employees Notified;	No	llected material to drums and/or		Sill Initials)	FrE/Safety Equipment Needed	Processingly and the second	Chemical resistant filoves and the Chemical resistant filoves and the control of the chemical resistant filoves and the chemical resistant filoves are chemical resistant filoves and the chemical resistant filoves are chemical resistant filoves and the chemical resistant filoves and the chemical resistant filoves are chemical resistant filoves and the chemical resi	Steel toe boots	Hard hat	Respirator	2 LEL meters- 1 for room 1 for	burner with warning lights	Nitrogen fire suppression system	Air horn	Spark resistant tools	COURTING VERTILIATION				9	,		-					99
EASURES DETERMINATION AND FOR 17 12 12	ON ALLAND A	ttions		Yes	and transfers collected material to drums and/or	SONAL PROTECTIVE EQUIPMENT: (Indicate Specific U.	Remarks/Persian and Asset	\top	allow for different in when	2. Ground drum prior to opening.			3. Always toss materials into conveyor	that levels	******		큺		meter for the room shows acceptable levels	Use non-sparking plastic shovel to	move material into conveyor. Do not	use hands to move materials.	5. When processing aerosols, ensure all equipment is shut down and the 1 RI	meter for the room shows acceptable	levels,	Use gloves when handling hose and	Use care when moving around bose	to prevent tripping.	IIRE D	Pressure/Chemical Pipe Opening Yes	
ASURES DETERMINATI	Page 1 of	redder O	Related Operating Procedures Reviewed: Yes No	ums of aerosol cans and shrade feet		ONAL PROTECTIVE EQUIPM	Hazard	1. SB- Struck by forklift	DECOEX POSITION	P	innalation), Hammable meterials		3. Q. Repetitive motion, overextending to reach material in		E-Flammable materials		-	Cangin on conveyor					er rammaore marenais, emical exposure (skin, inhalation)	FS-Trip over hase for pump		in the second of			PERMIT REQUIRED	Pressure/Ch	Welding/Hot/Burning
PROTECTIVE ME		Suredder Operator	Date Conducted: 03/13/03	Process Description: Unpacks boxes and dr		HAZARDS AND PERS		1. Using forklift, move materials		2. Open drum of box Cortaining materials		3 Manually servers in	confiner and toss into conveyor.		- -	Temperature	shredded material into Conveyor to	trash compactor.				5. Using diaphragm miner month	liquids into tole from singedder.					- Consideration of the Constitution of the Con		125	g-out Yes Mo
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PROTECTIV	E MEASURE	PROTECTIVE MEASURES DETERMINATION AND JOB HAZARD ANALYSIS	JOB HAZARD ANALYSIS
		Page 2 of 2	
Job Title: Shredder Operator		edder O	
		EMPLOYEE NOTIFICATION	en standarde en la company de la company
fy that I underst	and the hazards in	nvolved with the job and will comply	and the hazards involved with the job and will comply with the established safe want and
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Supervisor Signature:		Completion of OJT (dates)	Parter
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I certify that I have conducted a protect findings on this form.	ctive Measures Do	etermination and Job Hazard Analysi	estrify that I have conducted a Protective Measures Determination and Job Hazard Analysis of the above named process and have detailed the indings on this form.
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	XPLANATION	EXPLANATION OF ABBREVIATIONS FIRED IN DATA OF THE SET	A P. P. P. D. P. COL. 118 Sec.
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Person is either in motion or stationary, but		Person is in motion and object is stationary	CB-Caught Between
the object that strikes the penion i		()	"strice boints."
CW. Contact With		CBy- Contacted By	
Person makes contact with somethin	g hot,	The hot or sharp object, chemical or	Derson or nart of the nerroul. L. d. :
sharp, a chemical or electricity		electricity makes contact with the person	enclosure or hole of some kind
CO-Caught Us		FS-Fall at the Same Level	a na. 7 To man data
Person has part of clothing on a dy	caught	Person falls to the same level at which they	Person falls from one level to a lower facel
on a moving or stationary abject		are walking:	19A91 PART PROPERTY AND THE PROPERTY AND
O- Overezertion or Repetitive Motion		E- Environmental Exposures	Sampling Conducted:
Person is injured by putting too much strain		Person is exposed to firmes, gases, vapors,	Chenical exposure
on some part of the body, or his body is		mists, dusts, temperature extremes, oxygen	Heat/cold stress
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MODEL MS175 SHREDDER OPERATION

- 1. Turn on Carbon Filter Unit
- 3. Make sure that the block in the duct work is in the in position.
- 4. Be sure LEL system is functional.
- 5. Turn on nitrogen purge observe the flow indicator—if no flow—STOP!
- 6. Start outlet conveyor
- 7. Start feed conveyor
- 8. Close fire door to shredder room.
- 9. Close fire door to acid storage room. NOTE: Do not block your exits.
- 10. Put on appropriate PPE including respirator.
- 11. Turn on shredder.
- 12. Feed materials onto conveyor at approved rate.

NOTES:

Only spark-proof tools may be used in conjunction with this operation. No one is to be in the shredder room while the shredder is in operation. Do not block fire shutter rails-opening to feed conveyor.

Periodically check vapor levels with hand-held LEL/oxygen meter to ensure levels are below 40 percent LEL.

When using air-operated around or air operated pumps to collect liquids from sump and transfer to drums or totes bond the container to the shredder frame. (SEE POLICY on GROUNDING & BONDING)

SHUTDOWN:

- 1. Turn off power to shredder.
- 2. Turn off feed conveyor.
- 3. Turn off outlet conveyor.
- 4. Turn off nitrogen purge
- 5. Securely seal all druggs use spark-proof wrench only.
- o. Remove crummed lies from room and store in appropriate interior storage area.
- 7. Clean up all debris.
- 8. Turn off Carbon Filter Unit. (Unit should run at least 15 minutes after turning off shredder.)

SEP 0 5 2007

MISCELLANEOUS NOTES:

At no time should the shredder be left unattended while materials are in the catch box. If materials are left in the look flammable vapor will continue to be generated. Steps 1, 2, 3, and 4, AND 5 of the shut down procedure must be performed if only to take a break.

If the shredder stops operating and the LEL monitoring system sounds, PERSONNEL SHOULD stop all further operations until the LEL drops to an acceptable level. THE SHREDDER POWER WILL BE TURNED OFF AT THE FANEL AUTOMATICALLY.

At no time during operations is a standard L.P. gas-operated forklift to be used in shredder room or adjoining operation room. An L.P.S. rated forklift must be used in this room.

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Attachment

Record of Employee Training

EMPLOYEE TRAINING RECORDS: REFER TO ON-SITE TRAINING RECORDS FOR EMPLOYEES

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Attachment

II-4

Training Program Outlines /
Syllabus

RAINING

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Sheets

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Personal protective equipment I
 Levels of protection A, B, C, and D
Types, selection and use
 Limitations of equipment
 Gloves
 Coveralls
 Boots
 Bye protection
mace and head protection
Maintenance of equipment
Respiratory protection
Overview
Types of respirators
Protection factors
Timitations
Selection
Proper use
Maintenance & storage
Fit testing
Medical requirements
Discussion
```

12:00 Noon - 1:00 P.M.

Case studies

0

0

0

0

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PPE Demonstration
Don & doff Level A PPE
Don & doff Level B PPE
Don & doff Level C PPE
Demonstrate field respirator fit test
Demonstrate PPE in Section
```

```
J. Student practice drill
o Don & doff Level A PPE
o Don & doff Level B PPE
o Don & doff Level C PPE
o Respirator scenarios
o Discussion
o Emitations of PPE
o Agiourn
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SEP 0 5 2007

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ENVIRONMENTAL ENTERPRISES INCORPORATED Environmental Assessment Group

FORTY HOUR HAZARDOUS WASTE SITE OFERATIONS TRAINING
HAZWOPER OSHA 29 C.F.R. 1910.120
July 10-14, 1995

DAY ONE	
MODULE A	
8:00 A.M.	A. Introduction ()
0.00 W. 1111	o Course Overview
b	o OSHA Regulations
•	o EPA Regulations
	o Internal Safety and Health Structure
	o Internal Communications
•	o Internal operating organizations
9:00 A.M.	* razard Communication * Training
) Labeling and Material Safety Date Sheets
	o Recordkeeping
MODULE B	
10:00 A.M.	B. Basic Environmental Safety & Health
TO ' GO W - 111 .	o Environmental considerations
'	o Site characteristics
	o Environmental agents & types of hazards
	o Human body functions - basic physiology
	o Hazard recognition & evaluation
	o Control technology
11:00 Noon	o Emergency situations
TT:00 MOOU	
•	
	a series Planning
• •	o Contingency Planning
	1.00 D. M
LUNCH	12:00 Noon - 1:00 P.M.
MODULE C	
1:00 P.M.	C. Basic Industrial Hygiene
	o Survey of toxicology
	o Routes of entry
	o Target organs
· · ·	o Hazard recognition & evaluation
3:00 P.M.	o Emergency recognition, evaluation & control
MODULE D	
J:00 P.M.	n entropmental safet thealth a management of management scenarios
•	o avecsure scenarios
	Industrial plants
	Waste sites
•	Transportation accidents
	o Human protection
•	o Control technology on-site
4:30 P.M.	o Medical monitoring
5:00 P.M.	o Adjourn : CP U
	SERVICE CONTRACTOR OF THE PROPERTY OF THE PROP

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DAY TWO
 MODULE E
                      Ehvsical hazards
 8:00 A.M.
                       Heat & cold stress
                       函Lectricity
                 o
                      Mechanical energy
                      Radiation
                 O
                      Fire & reactions of flammable substances
 9:00 A.M.
                      NFPA fire warning system
                 O
                      Special reactions
                 O
                      Conversion of energy
                      Uncontrolled reactions
                     Grounding and bonding Basics of insipient firefighting
                 O
                 O
MODULE F
                      Noise & vibrations
                 Ţ.
 10:00 A.M.
                      Hazards of noice & ONHA Noise standard
                      Measurement of noise
                 O
                      Protection against noise
                 Ο.
                      Vibrations
                 O
                      Health effects of vibrations
 11:00 noon
                 0
                      Hearing loss
                 Ø
                      Cumulative Trauma Disease
                 O
                      Ergonomics
                 12:00 Noon - 1:00 P.M.
LUNCH
MODULE G
                      Chemistry of hazardous substances I
1:00 P.M.
                 G.
                      Nomenclature
                 O
                      Organics
                 0
                     Solvents
                     PCBs
                 Ö
                     Inorganics
                 O
                      pH system
                 0
                      Metals, including water reactives
                 O
                      Non-metals
                 o
                      Elements
2:00 P.M.
                      Compounds
                 O
                      Sulfide reation chemistry
                O
                      Cyanide reaction chemistry
                O
                      Asid-base reaction cheistry
                ō
                     Chemistry of hazardous substances II
                F.
MODULE F
                     Physical properties
3:00 P.M.
                Q
                      Chemical properties
                o
                      Physical Reactions
                Ċ
                     Manical Reactions
                <u>ن</u>.
                     commons hazardous reactions
4:00 P.M.
                ø
                     Telymerization -
                Q.
                     Reduction Oxidation reactions
                0
                     Heat of solution
                a
                     Heat of reaction
                O
                     Detonations and deflagrations
                                                              SEP O 5 2000
                Ö
5:00 P.M.
                     Adjourn
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DAY THREE

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MODULE G
                     Personal protective equipment I
8:00 A.M.
                G.
                     Levels of protection \tilde{A}, \tilde{B}_g C, and D
                О
                     Types, selection and use
                0.
                     imitations of equipment
                0
                      Cloves
                Ó
                     Coveralls
                0
                     Boots
                О
                     数e protection
                O
                     Face and head protection
                Ö
                     Maintenance of equipment
                O
                    Respiratory protection
                MODULE H
                     Overview
10:00 A.M.
                     Types of respirators
                0
                     Protection factors
                Ö
                    Limitations
                O.
                     Selection
                O
                     Proper use
                Ò
                     Maintenance & storage
                O
                     rit testing
                o
                     Medical requirements
                o
                     Discussion
11:30
                0
                     Case studies
                12:00 Noon - 1:00 P.M.
LUNCH
                    PPE Demonstration
                ĩ.
MODULE I.
                     Don & doff Level A PPE
1:00 P.M.
                o
                     Don & doff Level B PPE
                0
                     Don & doff Level C PPE
                0
                     Demonstrate field respirator fit test
                o.
                    Demonstrate PPE in Section
2:00 P.M.
               ď
                    Student practice drill
MODULE J.
                     Don & doff Level A PPE
               0
3:00 P.M.
                     pon & doff Level B PPE
               0
                    Don & doff Level C PPE
               0
                    Respirator scenarios
               O
                    Discussion
4:30 P.M.
               O
                    remitations of PPE
               Ç
                       giourn
5-00 P.M.
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DAY FOUR
                    Gonfined space
MODULE K
8:00 A.M.
                      Confined space regulations
                 Q
                    Recognitions of hazards
                     Personal protective equipment
                      Buddy system
9:30 A.M.
                     Rescue
                     Lock-out/tag-out
MODULE L
                Ŀ.
10:00 A.M.
                     Overview
                0
                    Regulations
                0
                    Recognition of hazards
                Control methods
11:30 Noon
                12:00 Noon - 1:00 P.M.
LUNCH
                    wironmental Monitoring
MODULE M
                Μ.
                     Site appraisal
1:00 P.M.
                O
                    Sampling procedures Chain of custody & recordkeeping
                O
                0
                     Weather considerations
                O
                     Contamination transport off-site
                O
                     Emergency response
                O
                    Hazard control
                O
                     personnel protection
2:30 P.M.
                     Monitoring Practices
                N.
MODULE N.
                    Overview
3:00 P.M.
                O
                    Direct reading instruments
               · Ø
                     Colorimetric tubes
                O
                     Oxygen indicator
                O,
                     Explosion meter
                Ö
                     PID meter
                     Carbon monoxide detector
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Heat Stress measurements

Industrial hygiene monitoring

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Adjourn

4:00 P.M.

5:00 P.M.

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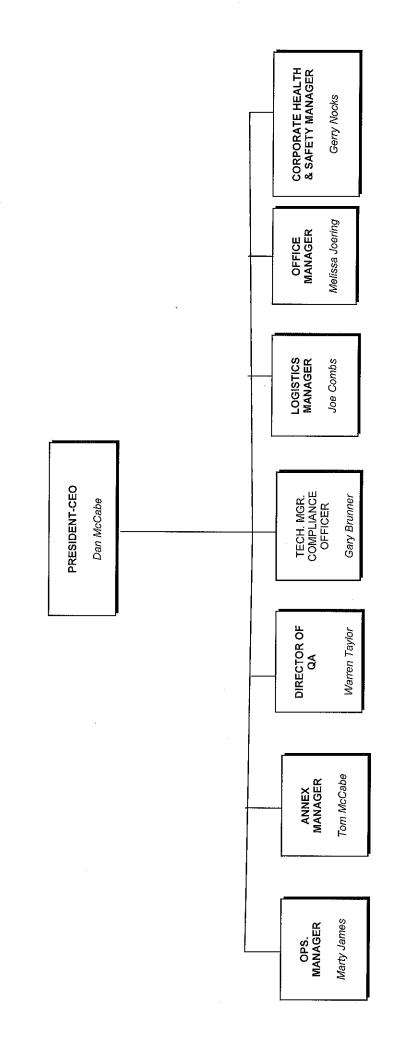
```
Hazardous Waste Site Management
MODULE O
                     elanning
 8:00 A.M.
                     Recordkeeping & manifests
                     Site Control
                     Work Zones
                 O.
                      Staffing
                     Security !
Incompatible wastes
                     Emergencies & contingencies
9:30 A.M.
                     Scenario Student Exarcises
MODULE P
                     WOyerview
10:00 A.M.
                     Scenario One
                 O
                     Scenario Two
Scenario Three
Scenario Four
12:00 A.M.
                12:00 Noon - 1:00 P.M.
LUNCH
                     TSDF SITE TOUR
MODULE Q
                     On-site instruction
1:00 P.M.
                0
                    Emergency contingency plan
Site specific situations
                0
                    Twine safety
                Q.
                    PRE at plant
                     Adjourn
5:00
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TRAINING RECORDS

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ENVIRONMENTAL ENTERPRISES, INC. MANAGEMENT ORGANIZATIONAL CHART



Environmental Enterprises Incorporated



This is to certify that

DANTEL MCCABE

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

March 13, 2012

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This is to certify that

MARTYJAMES

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

March 13, 2012

Environmental Enterprises incorporated



This is to certify that

TOM MCCABE

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

March 13, 2012

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This is to certify that

WARRENTAKOR

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

March 13, 2012

environmental Enterprises incorporated



This is to certify that

GARYBRUNNER

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

March 13, 2012

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This is to certify that

JOE COMBS

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

March 13, 2012



This is to certify that

MELISSA JOERING

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

March 13, 2012

Gerald Nocks, CET Corporate EH&S Manager

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Environmental Enterprises Incorporated



This is to certify that

GERRY NOCKS

Has successfully completed the course entitled

HAZWOPER 8-Hour Worker Refresher Training pursuant to OSHA 29 CFR 1910.120

December 16, 2011

Warren Taylor Corporate QA/QC Manager

EPA ACKNOWLEDGEMENT LETTER

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ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

CHDOB3377010 REACKNOWLEDGEMENT

ENVIRONMENTAL ENTERPRISES INCORPUNA

10147 SPRINGFIELD PIKE

CINCINNATI OH 45215

4650 SPRING GROVE AVE

CINCINNATI OH A5232

EPA Form 8700-12A (4-80)

BLANK PCB PROFILE

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FOR EEI USE ABS: Profile Log:			NTERPRISE WASTE PI		EEI Approval/Profile #
Entered by:	40 40 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Page 1		A deb. B II minist month	
Date:	<i>PCB</i> On		ly Approval	PCB	Sales Code:
Customer Reference#					
Generator Name:			Billing Name:		
Contact Name:			Contact Name:	······	
Address:			Address:		
City:			City:		
State:	Zip:		State:		Zip:
Area Code + Phone #	-	A	Area Code + Pho	ne#	_
Area Code + Fax #	_		rea Code + Fax	:#	7
USEPA ID#					
Name of Waste:					
Process Generating:		· · · · · · · · · · · · · · · · · · ·			
Date in Storage for Disposal:					
Anticipated Volume:	Lbs.	Kg.	Dru	ıms	X One Time
Size and Type of Container:				Number of C	ontainers:
DOT Shipping Name:					
Hazard Class:	UN/NA#	Packing	Group:	Samples Inc	luded?YesNo
Is this a RCRA Waste?Yes	s No	RCRA Code: _		PCB Waste	Code: PCB1 PCB2
Unique identification numbers for			essary)		
List all Serial Numbers for Transfo	ormers, Capacitors, or Re	ctifiers:			
Transformers Drained? Flushed? Capacitors Large Leaki Capacitors Small Leaki Light Ballasts Leaking? Debris (clothing, rags, woo Contaminated soil, rock, et Are free Liquids Present? Total Wt.	ng? d, metal, etc.) c. _YesNo _Lbs or Kg.	(Attach An	No No No No No No centration:	Empty Drums PCB Sludge Flushing Oil Rectifier Transformer Oil Lab Pack Other < 50 ppm > 500 ppm	50 - 500 ppm
Transformer Liquid Volume:	Transformer	· Size:	Length	Width	Height
Additional Description/Comments:					
The above information is true and Guideline Documents SW-846, EF					
Signature:		Title	:	 	Date:
Date:	Status: APP	REJ	Price:		per:
FOR Waste Codes:		· · ·—•	Plant Comme	nts (Internal):	
USE Restricted: Yes	No Price Code:	•			
ONLY H Code: H	ABS Code:		Profile Notes:		
Handling Code:					
Facility:			Special Preca	utions:	
initial EEI PSS#			Equipment:		

RECOGNITION LETTER

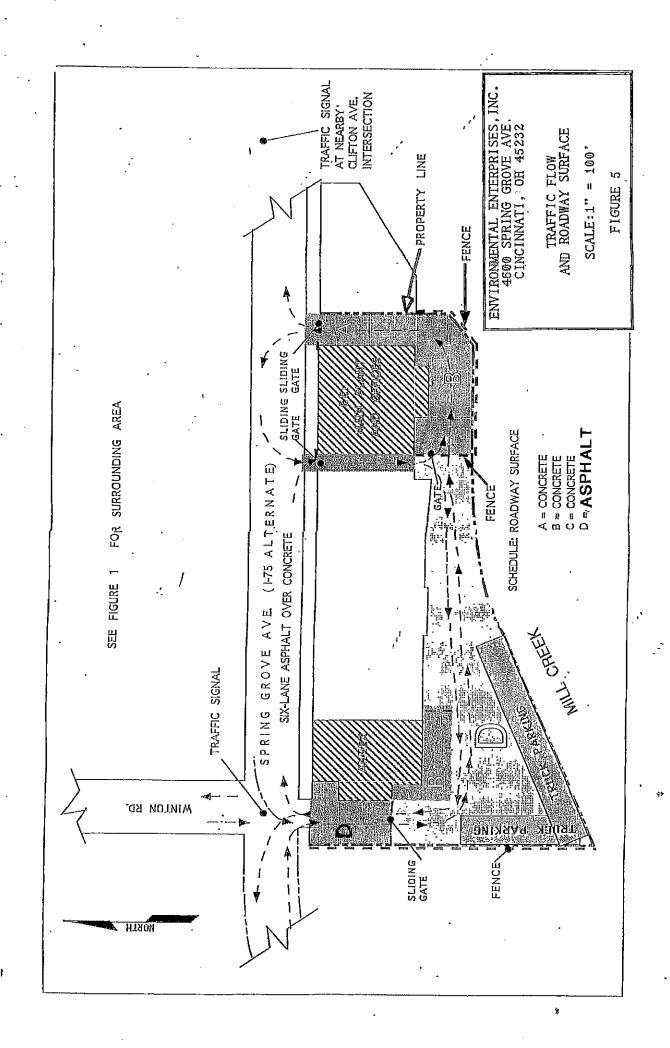
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Mr. Dan McCabe is hereby recognized this day of June 20th 2012 by Spring Grove Village Community Council for his excellence in "Adding To The Beauty" of our neighborhood. On behalf of the council and our entire neighborhood, we wish to thank you and commend you to continue in your worthy efforts to make Spring Grove Village a more beautiful place to work and reside.

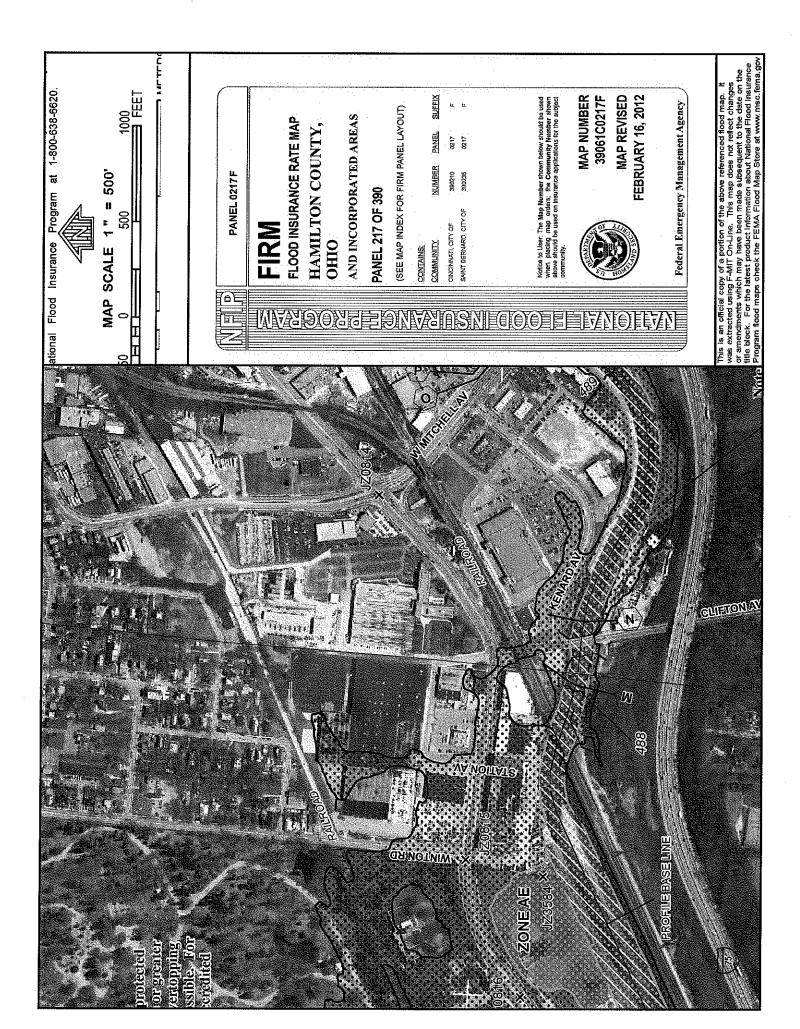
TRAFFIC FLOW MAP

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FLOOD MAP

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LEGEND

Program at 1-800-638-6620.

ational Flood Insurance



INUNDATION BY THE 1% ANNUAL CHANCE FLOOD SUBJECT HAZARD AREAS FLOOD SPECIAL

Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard may include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base The Special The 1% annual chance flood (100 year flood), also known as the base flood, is the flood Flood Elevation is the water-surface elevation of the 1% annual chance flood. that has a 1% chance of being equaled or exceeded in any given year.

No Base Flood Elevations determined. **ZONE A**

Base Flood Elevations determined. **ZONE AE**

Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.

average depths determined. For areas of alluvial fan flooding, velocities Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain);

ZONE AO

ZONE AH

ZONE AR

chance flood event by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or Area of special flood hazard formerly protected from the 1% annual also determined.

Area to be protected from 1% annual chance flood event by a Federal flood protection system under construction; no Base Flood Elevations greater flood.

ZONE A99

determined.

Base Flood Coastal flood zone with velocity hazard (wave action); no Elevations determined. Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined

ZONE VE

ZONE V

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.



OTHER FLOOD AREAS

ZONE X

with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance Areas of 0.2% annual chance flood; areas of 1% annual chance flood

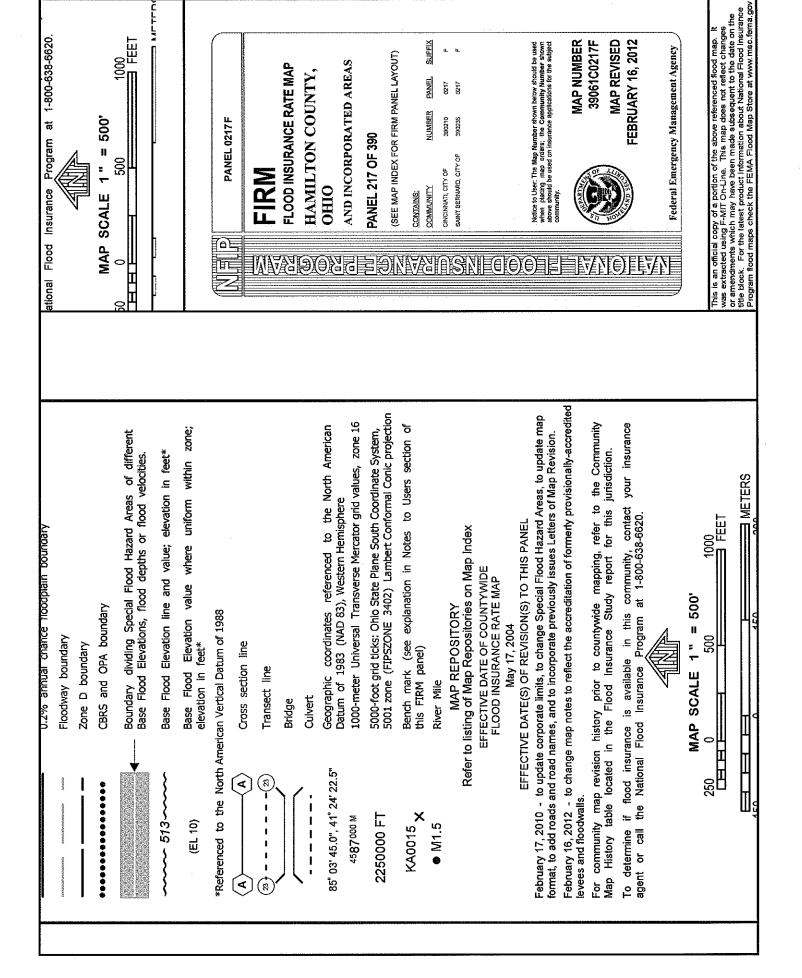
CLITTING I SUFFIX **FEBRUARY 16, 2012** MAP NUMBER 39061C0217F MAP REVISED Notice to User: The Map Number shown below should be used When placing map orders; the Community Number shown above should be used on insurance applications for the subject community. (SEE MAP INDEX FOR FIRM PANEL LAYOUT) AND INCORPORATED AREAS FLOOD INSURANCE RATE MAP HAMILTON COUNTY, PANEL 0217 0217 NUMBER 390210 390235 MAP SCALE 1" = 500" PANEL 0217F **PANEL 217 OF 390** SAINT BERNARD, CITY OF CINCINNATI, CITY OF OHO COMMUNITY CONTAINS a E I I

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

Federal Emergency Management Agency

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This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT OFF-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood insurance Program flood maps check the FEMA Flood Map Store at www.msc.fen Program at 1-800-638-6620. SUFFIX Notice to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject. MAP NUMBER 39061C0217F MAP REVISED **FEBRUARY 16, 2012** Federal Emergency Management Agency (SEE MAP INDEX FOR FIRM PANEL LAYOUT) 1000 AND INCORPORATED AREAS FLOOD INSURANCE RATE MAP HAMILTON COUNTY, PANEL 0217 NUMBER 390235 390210 MAP SCALE 1 .. = 500' PANEL 0217F **PANEL 217 OF 390** SAINT BERNARD, CITY OF 20 CINCINNATI, CITY OF 0HO ational Flood Insurance COMMUNITY CONTAINS ĐΕ H T T ay is the channel of a stream plus any adjacent floodplain areas that must be of encroachment so that the 1% annual chance flood can be carried without Coastal flood zone with velocity hazard (wave action); Base Flood Elevations with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance Areas of 0.2% annual chance flood; areas of 1% annual chance flood CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas. Base Flood Elevation value where uniform within zone; Boundary dividing Special Flood Hazard Areas of different Areas determined to be outside of the 0.2% annual chance floodplain. Base Flood Elevation line and value; elevation in feet* Base Flood Elevations, flood depths or flood velocities. Areas in which flood hazards are undetermined, but possible. COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS 0.2% annual chance floodplain boundary 1% annual chance floodplain boundary OTHERWISE PROTECTED AREAS (OPAs) CBRS and OPA boundary *Referenced to the North American Vertical Datum of 1988 FLOODWAY AREAS IN ZONE AE Floodway boundary elevation in feet* Zone D boundary Cross section line Transect line OTHER FLOOD AREAS Bridge substantial increases in flood heights. OTHER AREAS determined The floodway is the channel (R) ----- 513----⋖ ************** 1 EL 10) cept free **ZONE VE ZONE X** ZONE D ZONE X < [8]



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PCB STORAGE AREA

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Maximum Storage

80 Drums x 55 gal/ea. = 4400 gals 4 x 9.5 cu.ft. Transformers x 7.48 gal/cu.ft. = 284 gals

Total gallons = 4684 gals

Containment Capacity

20' x 24' x 8/12 x 7.48 gal/sq.ft. Storage Area = 2394 gals

Less 32" x 32" Column Displacement split by curb 2.67' x 2.67' x 8/12' x 4/2 x 7.48 gal/sq.ft. = -71 gals

Less Pallet Displacement

15 Pallets x 4' x 4' x 5/12' x 0.5 x 7.48 gal/sq.ft. = - 377 gals

Less 80/2 Drum Displacement

40 Drums x 1.25' x 1.25' x 3.14 x 3/12' x 7.48 gal/sq.ft. = - 367 gals

Less Transformer Displacement

4 Transformers x 9.5 sq.ft. x 7.48 gal/sq.ft. \approx - 284 gals

Total Capacity 1099 gals

Net Containment at 8" Depth:

2394 gals - 1099 gals = 1295 gals

Minimum Regulatory Requirement:

25% of storage volume = 1171 gals

8% SLOPE

8% SLOPE

6'-0

SECTION A-A of PCB RAMP AND CURB

SCALE 1" = 1'-0

ENVIRONMENTAL ENTERPRISES, INC. 4600 SPRING GROVE AVENUE CINCINNATI, OH 45232

ANNEX BUILDING
PCB CONTAINER STORAGE

MAY 24, 1995

-SILOXIRANE® C2033-

AMBIENT CURE PROTECTIVE LINING FOR CEMENT CONTAINMENT AREAS, DIKES FLOORS, PITS, ETC. HANDLING SOLVENTS, ACIDS, CAUSTICS

Description:

Siloxirane® C2033 is a two component lining system having a cross-linked organic-inorganic (SiO backbone with Penta (5) oxirane end caps) polymer base. C2033 has a very dense carbon-oxygen-carbon crosslinked molecular structure. The absence of problematic hydroxyl and ester groups makes Siloxirane impervious to:

Acids	Alkalies	Solvents
Sulphuric Hydrochloric Nitric Glacial Acetic Phosphoric	Sodium Hydroxide Potassium Hydroxide Hypocrités	Methylene Chloride Methanol MEK Acetone DMF

Siloxirane C2033NS is a non-skid version of C2033 containing a specially treated oxide that chemically bonds with the Siloxirane polymer.

Applications:

Siloxirane C2033 is an ambient cured lining (60°F and above) that can be applied by spraying, roller, brush or trowel. Siloxirane C2033 is a surface tolerant coating and will bond to cement, steel, glass, wood, plastics, etc. C2033 will bond to damp, moist, slightly oily, rusty, surfaces. Although Siloxirane C2033 is surface tolerant old concrete sealers have to be removed from the surface prior to applying coating. For outstanding adhesion a clean, blasted surface is preferred.

\sim	120	Time:	

Q 21 Q 11111Q1		
@ 75 of (24°C)	Foot traffic	12 hours
	Vehicle traffic	24 hours
	Chemical Service	5 to 7 days

SUMMARY OF BENEFITS

Broad range of chemical resistance
Steam_cleanable
Unique temperature span: 80°F to +200°F
Non-absorbent
Capable of handling impact of dropped drums and dragged forks
Maintains a tough, hard surface

Easily patched by maintenance personnel
Outstanding abrasion wear resistance
Excellent adhesion, even with flexing
Complies with FDA 21 CFR 177.2420

Areas of Usage

- Solvent containment pits and dikes
- Waste acid pits
- Acid troughs
- Oil and gasoline containment areas
- · Gasohol containment areas
- Acid tank containment dikes
- Corrosion resistant flooring
- Tank coatings
- Coating of steel structures

Typical Properties

Ì	1 y p 10 cm 1 1 0 p 0 1 1 1 0 cm	C2033	C2033NS
	Finish	Oyster White	Gray
	Weight per Galloп	11.0 lbs.	16.6 lbs.
	V.O.C. Level/Gal	0.85 lbs. 9.6 gms/ml	0.47 lbs. 4.8 gms/ml
	Lead Content	Zero	Zero
	Pot Life (75°F) (24°C)	1lb. Mass - 120 3 Gals - 45	
	Viscosity	300-500 Cps	
	Flash Point	53°C	53°C
	Solids By Volume	87.4%	95.0%
	Solids By Weight	94.0%	99.0%
	Chromate Content	Zero	Zero
	Practical Coverage (sq. ft. per Gallon)	65	40
	Recommended Film Thickness (dry) mils	20-22	34-35
	Shelf Life	One Year minimum 50-90°F (10-32°C)	when stored at



AVON, OHIO 44011 USA

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-SILOXIRANE®

C2033-

Performance and Economical Excellence

PERFORMANCE

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SILOXIRANE C-2033	Α	A	<u>IA</u>	IA.	A	ļA.	A	A		-	A.	A I		A	A	-	Α	A	A	A	Α	L	N		L	N	Α	L	Α	Ν	Α	Α	Α	N	Α	N	Α	
VINYL ESTER	N	N	A	Α	Α	<u>A</u>	N.	Α	Α	Α	N	N	<u> </u>			-	-	1	├	N		N	N	N	N	N	Α	N	A	L	N	Α	Α	N	A	N	Α	
EPOXY (HIBUILD)	N	N	Α	Α	N	Α	N	N	N	Α	N	N	N	Α	Α	N	A	-	A	"			-	N	N	N.		Ā	A		N	A	A	Ā	N	N		
RUBBER	L	N	Α	Α	N	Α	N	N	A	N	Α	•	N	L_	Į N	N	N	L	ĮΑ	<u> </u>	Ľ	Ν	ĺΝ	14	14	14		<u> </u>			<u> </u>	<u></u>	1	1.,"	-		لــــــــــــــــــــــــــــــــــــــ	

A = Good at ambient temperatures

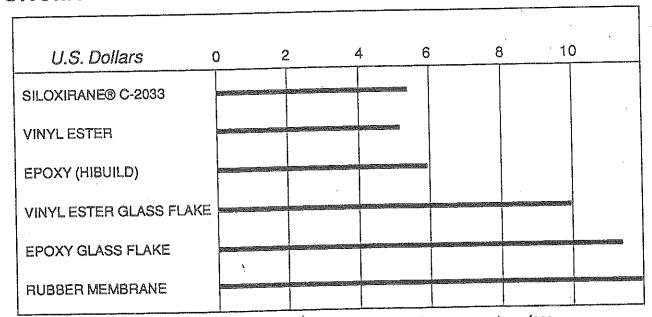
L = Limited Service

N = Not recommended

- = No information

ECONOMY

Total Applied Cost per Square Foot



Based on 4000 square foot area-2 coat application on concrete surface.



AVON, OHIO 44011 USA

ann 334-7193

TELEX 985504

FAX 216 937-5046

SILOXIRANE

PHYSICAL PROPERTIES

Tensile Strength	75°F	11,340 p.s.i.		4	Hardness	75-78 Barcol
(ASTM D638)					Permeability-Vapor	0.0000 gm.
Flexural Strength Flexural Modulus		18,650 p.s.i. 816 k.s.i.	,		Transmission of Water at 90°C for 7 Days	per sq. ft. per 7 days per inch thickness
(ASTM D790)					Impact Resistance	37 in/lbs
Elongation	75°F	11.2%	:		(ASTM D2794)	
Water Absorbtion (ASTM D570)	(30 days in 88°C Water)	0.25%			U.V. Light Resistance (ASTM G53)	40+ years

APPLICATION DATA

SURFACE PREPARATION

Sandblast with clear sand or grit to obtain an anchor pattern. All oils, soluble salts and loose concrete must be removed and the surface degreased. Concrete must have cured at least 30 days at 70°F.

MIXING INSTRUCTIONS

Material is supplied in two containers as a unit. Always mix a complete unit in the proportions supplied. (1) Thoroughly mix the contents of Part A with a power agitator until uniform consistency and color is obtained. Be sure that any solids that may have settled through storage have been put back in suspension. (2) Slowly combine the contents of activator with previously mixed Part A. (3) Thoroughly mix the two parts until a uniform consistency and color is obtained. (4) Use immediately due to short pot life.

LIMITATIONS

Apply in good weather when the air and surface temperatures are above 60°F. Surface temperatures must be at least 5° above the dew point. For optimum application properties, bring material to 70°-90°F prior to mixing and application. Increased temperatures will result in shorter pot life.

APPLICATION

C2033

Airless spray equipment with 30:1 pump ratio @ 80-100 lbs. to achieve 2400-3000 p.s.i. tip pressure. Reverse-A-Clean tip .019 to .023, with 3/8" fluid hose, 1/4" by 6' whip hose, with a maximum of 100 linear feet. This coating is a low VOC compliance material. If conditions require a viscosity adjustment, thin with MEK.

C2033NS Brush, Roll or Trowel

CLEAN UP SOLVENT

Acetone, MEK



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-SILOXIRANE®

C2033

AMBIENT CURE PROTECTIVE LINING FOR CEMENT CONTAINMENT AREAS, DIKES FLOORS, PITS, ETC. HANDLING SOLVENTS, ACIDS, CAUSTICS

APPLICATION DATA (cont.)

CURE TIME AND TEMPERATURE

Curing at Ambient Temperatures

The temperature should be at 60°F or above. Lining will lose tackiness and become hard in 2 to 4 hours, depending on the prevailing temperature. Full curing will occur in 2 to 7 days, depending on temperature. Allow second coat to dry 24 hours before walking or driving on it.

HANDLING PRECAUTIONS

Solvents and chemicals are contained in this product. Consult the Material Safety Data Sheet for details. Adequate safety and health precautions should be taken during handling, application and drying of this product. This material should be applied under local, state and federal regulations and in accordance with OSHA and ANSI bulletins on safety requirements.

PACKAGING

3 Gallons Kit Consists of: 3 gallons Resin 40 oz. Catalyst

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AVON, OHIO 44011 USA



SILOXIRANE PRODUCT INFORMATION

SILOXIRANER Linings for the Storage of Chemicals

SILOXIRANER A unique, tough, versatile protective material ... chemically described as an siloxirane oligimer of proprietary compositions ... giving industry corrosion/erosion control at an economical cost.

THREE PRIMARY MARKETS FOR SILOXIRANER ARE:

- 1. Chemical Manufacturing
- 2. Chemical Storage
- 3. Chemical Waste Disposal

FEATURES OF SILOXIRANER LININGS:

- Broadest Range of Chemical Resistance
 acids, bases and solvents, from pH 1 to 14
- * Unique Temperature Span -- can be utilized -80°F. to +500°F.
- * Coefficient of Expansion similar to Stainless Steel
 - -- can withstand thermal shock over a wide range of temperatures. Coating will expand and contract with the metal.
 - -- can be loaded hot even in the coldest weather.
- * Steam Cleanable
- -- Allows thorough cleaning and ease of decontamination between uses.
- -- An important feature when storing both hazardous waste and virgin chemicals.
- * Non Absorbent
- -- Will not absorb water/chemicals even at elevated temperature and pressure.
- -- Reduces the chance of load to load contamination.
- -- Improves safety by reducing chances for unwanted chemical reactions.

continued (over) ...

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- * Maintains a Hard Tough Surface
 - -- Under extreme temperatures
 - -- In concentrated or dilute acids and bases
 - -- All types of Solvents
- * Excellent Adhesion, Even with Flexing
 - -- Steel will permanently deform before coating is harmed.
- Can be easily Patched by your own people
 - -- Saves time and money
- * Outstanding Abrasion Wear Resistance
 - -- Proven to be better than steel and rubber
 - -- Capable of handling slurries and sludges
- * SILOXIRANER Linings Generate Profits
 - -- Can be used for virtually any chemical
 - -- Protects contents from contamination
 - -- Provides extended life



SILOXIRANE PRODUCT INFORMATION

CHEMICAL RESISTANCE TABLE FOR SILOXIRANE C2033 AMBIENT CURED COATING

The following section contains a tabular listing of chemical reagents in which Siloxirane C2033 was immersed at a temperature of 80°F. (27°C) for a period of 6 months.

This guide is intended as an aid in determining the potential usefulness of Siloxirane C2033 as a protective barrier against chemical exposure. Each application should be evaluated according to its particular circumstances and conditions.

REY: A = Suitable for constant immersion

B = Suitable for shorter term containment & continual spillage

C = Suitable for intermittent spills when followed promptly with

water flushing

NR = Not Recommended

AP = Consult Advanced Polymer Sciences, Inc.

A		Ď	
Acetic Acid, 10% Acetic Acid, 30% Acetic Acid, Glacial Acetone Acrylic Acid, up to 25% Acrylonitrile Alum (Aluminum Potassium Sulfate) Aluminum Chloride Aluminum Fluoride Aluminum Hydroxide Aluminum Nitrate Aluminum Sulfate Ammonium Bisulfite Ammonium Chloride Ammonium Hydroxide Ammonium Hydroxide Ammonium Sulfate Ammonium Sulfate Ammonium Sulfate Ammonium Sulfate Ammonium Sulfate n-Amyl Alcohol Aniline	A A A A A A A A A A A A A A A A A A A	Barium Chloride Barium Hydroxide Barium Sulfate Barium Sulfide Benzene Benzene Sulfonic Acid Benzoic Acid Black Liquor, Pulp Mill Bleach Liquor, Pulp Mill Boric Acid Brine Bromine, Liquid Bromine Gas (Dry & Wet) n-Butyl Alcohol Butyl Cellosolve Solvent n-Butyric Acid Butyl Acetate C Cadmium Chloride	A A A A A A A A A A A A A A A A A A A
		Calcium Chloride	A

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C			u
and the state of t	Â	Fatty Acids	A
Calcium Hypochlorite	A	Ferric Chloride	A
Calcium Nitrate	A	Ferric Nitrate	A
Calcium Sulfate	À ,	Ferric Sulfate	A
Calcium Sulfite	. A.	Ferrous Chloride	A
Carbon Dioxide Gas	В	Fluosilicic Acid	В
Carbon Dissulfide	A	Formaldehyde	A
Carbon Tetrachloride	B B	Formic Acid	В
Chlorine Dioxide	В	Fuel Oil	A
Chlorine Gas (Dry & Wet)			
Chlorine Water	A)	
Chloroacetic Acid, 50%	C	r	
Chlorobenzene	A	G	
Chloroform	A		
Chromic Acid, 15%	- A	Gasoline	A
Chromic Acid, 50%	В	Glycerine	A
Citric Acid	A	4 m 1 4 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1	
Copper Chloride	A	•	
Copper Cyanide	A	\$ \$	
Copper Nitrate	A	- I	
Copper Sulfate	A		
Corn Oil	A	Heptane	A
Crude Oil, Sour	A	Hexane	A
Crude Oil, Sweet	A	Hydrobromic Acid	A
Cyclohexane	A	Hydrochloric Acid, 15%	A
Cyclohexanol	A	Hydrochloric Acid, 37%	A
Cyclohexanone	PA.	Hydrofiluoric Acid	C C
-		Hydrogen Peroxide	A
		2 7	A
•		Hydrogen Sulfide	μ.
Dichlorobenzene	A	Ţ	
Dichloroethane	A		
Diesel Fuel	A	***	ī
Diethyl Benzene	В	Isopropyl Alcohol	£.
Dimethyl Formamide (DMF)	A	•	
•	•	J	
Natio		V	
· ·		Jet Fuel	,
Adadan Feederi	A		
Ethyl Acetate	A		
Ethyl Alcohol	В	K	
Ethyl Benzene	· A	i i	4
Ethyl Chloride	A		
Ethylene Chloride	A .	Kerosene	
Ethylene Glycol	n		

C.

В

Sugar/Sucrose

Sulfur Dioxide

Sulfuric Acid, 10%

Sulfuric Acid, 50%

Sulfuric Acid, 98%

A

Nitric Acid; 50%

n-Octyl Alcohol

Nitrobenzene

Nitric Acid/Sulfuric Acid

A Oils В Oleum A Oleic Acid Oxalic Acid

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Page Four

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Tall Oil Tannic Acid Tartaric Acid Tetrahdrofuran	A A A	Water, Deionized Water, Demineralized Water, Distilled	A A A
Toluene Toluene Sulfonic Acid Trichloroethylene Trisodium Phosphate	A A A	X Xylene	A
U		Z	
Urea	. A	Zinc Chloride Zinc Sulfate	A A

When significant amounts of trace impurities or combination of chemicals are to be resisted we encourage our customers to test a sample under actual or simulated use conditions before a final decision on the suitability of C2033 is made.

Advanced Polymer Sciences, Inc. can provide corrosion test coupons for customers to expose under actual service conditions or in the laboratory.

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(vi) Spilis that contaminate vegetable gradens.

(e) Relationship of policy to other statutes. (1) This policy does not affect cleanup standards or requirements for the reporting of spills imposed, or to be imposed, under other Federal statutory authorities, including but not limited to, the Clean Water Act (CWA), the Resource Conservation and Recovery Act (RCRA), and the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA). Where more than one requirement applies, the stricter standard must be met.

(2) The Agency recognizes that the existence of this policy will inevitably result in attempts to apply the standards to situations within the scope of other statutory authorities. However, other statutes require the Agency to consider different or alternative factors in determining appropriate corrective actions. In addition, the types and magnitudes of exposures associated with sites requiring corrective action under other statutes often involve important differences from those expected of the typical, electrical equipment-type spills considered in developing this policy. Thus, cleanups under other statutes, such as RCRA corrective actions or remedial and response actions under SARA may result in different outcomes.

§ 761.123 Definitions.

For purposes of this policy, certain words and phrases are used to denote specific materials, procedures, or circumstances. The following definitions are provided for purposes of clarity and are not to be taken as exhaustive lists of situations and materials covered by the policy.

Double wash/rinse means a minimum requirement to cleanse solid surfaces (both impervious and nonimpervious) two times with an appropriate solvent or other material in which PCBs are at least 5 percent soluble (by weight). A volume of PCB-free fluid sufficient to cover the contaminated surface completely must be used in each wash/rinse. The wash/rinse requirement does not mean the mere

spreading of solvent or other fluid over the surface, nor does the requirement mean a once-over wipe with a soaked cloth. Precautions must be taken to contain any runoff resulting from the cleansing and to dispose properly of wastes generated during the cleansing.

High-concentration PCBs means PCBs that contain 500 ppm or greater PCBs, or those materials which EPA requires to be assumed to contain 500 ppm or greater PCBs in the absence of testing.

surface industrial High-contact means a surface in an industrial setting which is repeatedly touched, often for relatively long periods of time. Manned machinery and control panels are examples of high-contact industrial surfaces. High-contact industrial surfaces are generally of impervious solid material. Examples of low-contact industrial surfaces include ceilings, walls, floors, roofs, roadways and sidewalks in the industrial area, utility poles, unmanned machinery, concrete pads beneath electrical equipment, curbing, exterior structural building components, indoor vaults, and pipes.

residential/commer-High-contact cial surface means a surface in a residential/commercial area which is repeatedly touched, often for relatively long periods of time. Doors, wall areas below 6 feet in height, uncovered flooring, windowsills, fencing, bannisters, stairs, automobiles, and children's play areas such as outdoor patios and sidewalks are examples of high-contact residential/commercial surfaces. Examples of low-contact residential/ commercial surfaces include interior ceilings, interior wall areas above 6 feet in height, roofs, asphalt roadways, concrete roadways, wooden utility poles, unmanned machinery, concrete pads beneath electrical equipcurbing, exterior structural building components (e.g., aluminum/ vinyl siding, cinder block, asphalt tiles), and pipes.

Impervious solid surfaces means solid surfaces which are nonporous and thus unlikely to absorb spilled PCBs within the short period of time required for cleanup of spills under this policy. Impervious solid surfaces

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include, but are not limited to, metals, glass, aluminum siding, and enameled or laminated surfaces.

Low-concentration PCBs means PCBs that are tested and found to contain less than 500 ppm PCBs, or those PCB-containing materials which EPA requires to be assumed to be at concentrations below 500 ppm (i.e., untested mineral oil dielectric fluid).

Nonimpervious solid surfaces means solid surfaces which are porous and are more likely to absorb spilled PCBs prior to completion of the cleanup requirements prescribed in this policy. Nonimpervious solid surfaces include, but are not limited to, wood, concrete, asphalt, and plasterboard.

Nonrestricted access areas means any area other than restricted access, outdoor electrical substations, and other restricted access locations, as defined in this section. In addition to residential/commercial areas, these areas include unrestricted access rural areas (areas of low density development and population where access is uncontrolled by either man-made barriers or naturally occurring barriers, such as rough terrain, mountains, or cliffs).

Other restricted access (nonsubstation) locations means areas other than electrical substations that are at least 0.1 kilometer (km) from a residential/commercial area and limited by man-made barriers (e.g., fences and walls) to substantially limited by naturally occurring barriers such as mountains, cliffs, or rough terrain. These areas generally include industrial facilities and extremely remote rural locations. (Areas where access is restricted but are less than 0.1 km from a residential/commercial area are considered to be residential/commercial areas.)

Outdoor electrical substations means outdoor, fenced-off, and restricted access areas used in the transmission and/or distribution of electrical power Outdoor electrical substations restrict public access by being fenced or walled off as defined under § 761.30(1)(1)(ii). For purposes of this TSCA policy, outdoor electrical substations are defined as being located at least 0.1 km from a residential/commercial area. Outdoor fenced-off and restricted access areas used in the transmission and/or distri-

bution of electrical power which are located less than 0.1. km from a residential/commercial area are considered to be residential/commercial areas.

PCBs means polychlorinated biphenyls as defined under § 761.3. As specified under § 761.1(b), no requirements may be avoided through dilution of the PCB concentration.

Requirements and standards means:

(1) "Requirements" as used in this policy refers to both the procedural responses and numerical decontamination levels set forth in this policy as constituting adequate cleanup of PCBs.

(2) "Standards" refers to the numerical decontamination levels set forth in this policy.

Residential/commercial areas means those areas where people live or reside, or where people work in other than manufacturing or farming industries. Residential areas include housing and the property on which housing is located, as well as playgrounds, roadways, sidewalks, parks, and other similar areas within a residential community. Commercial areas are typically accessible to both members of the general public and employees and include public assembly properties, instiproperties, stores, tutional buildings, and transportation centers.

Responsible party means the owner of the PCB equipment, facility, or other source of PCBs or his/her designated agent (e.g., a facility manager or foreman).

Soil means all vegetation, soils and other ground media, including but not limited to, sand, grass, gravel, and oyster shells. It does not include concrete and asphalt.

Spill means both intentional and unintentional spills, leaks, and other uncontrolled discharges where the release results in any quantity of PCBs running off or about to run off the external surface of the equipment or other PCB source, as well as the contamination resulting from those releases. This policy applies to spills of 50 ppm or greater PCBs. The concentration of PCBs spilled is determined by the PCB concentration in the material spilled as opposed to the concentration of PCBs in the material onto

which the PCBs were spilled. Where a spill of untested mineral oil occurs, the oil is presumed to contain greater than 50 ppm, but less than 500 ppm PCBs and is subject to the relevant requirements of this policy.

Spill area means the area of soil on which visible traces of the spill can be observed plus a buffer zone of 1 foot beyond the visible traces. Any surface or object (e.g., concrete sidewalk or automobile) within the visible traces area or on which visible traces of the spilled material are observed is included in the spill area. This area represents the minimum area assumed to be contaminated by PCBs in the absence of precleanup sampling data and is thus the minimum area which must be cleaned.

Spill boundaries means the actual area of contamination as determined by postcleanup verification sampling or by precleanup sampling to determine actual spill boundaries. EPA can require additional cleanup when necessary to decontaminate all areas within the spill boundaries to the levels required in this policy (e.g., additional cleanup will be required if postcleanup sampling indicates that the area decontaminated bу the responsible party, such as the spill area as defined in this section, did not encompass the actual boundaries of PCB contamination).

Standard wipe test means, for spills of high-concentration PCBs on solid surfaces, a cleanup to numerical surface standards and sampling by a standard wipe test to verify that the numerical standards have been met. This definition constitutes the minimum requirements for an appropriate wipe testing protocol. A standard-size template (10 centimeters (cm) x 10 cm) will be used to delineate the area of cleanup; the wiping medium will be a gauze pad or glass wool of known size which has been saturated with hexane. It is important that the wipe be performed very quickly after the hexane is exposed to air. EPA strongly recommends that the gauze (or glass wool) be prepared with hexane in the laboratory and that the wiping medium be stored in sealed glass vials until it is used for the wipe test. Further, EPA requires the collection and testing of field blanks and replicates.

[52 FR 10705, Apr. 2, 1987; 52 FR 23397, June 19, 1987]

§ 761.125 Requirements for PCB spill cleanup.

- (a) General Unless expressly limited, the reporting, disposal, and precleanup sampling requirements in paragraphs (a) (1) through (3) of this section apply to all spills of PCBs at concentrations of 50 ppm or greater which are subject to decontamination requirements under TSCA, including those spills listed under § 761.120(b) which are excluded from the cleanup standards at paragraphs (b) and (c) of this section.
- (1) Reporting requirements. The reporting in paragraphs (a)(1)through (iv) of this section is required in addition to applicable reporting requirements under the Clean Water Act (CWA) or the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA). For example, under the National Contingency Plan all spills involving 10 pounds or more by weight of PCBs must currently be reported to the National Response Center (1-800-424-8802). The requirements in paragraphs (a)(1) (i) through (iv) of this section are designed to be consistent with existing reporting requirements to the extent possible so as to minimize reporting burdens on governments as well as the regulated community.
- (i) Where a spill directly contaminates surface water, sewers, or drinking water supplies, as discussed under § 761.120(d), the responsible party shall notify the appropriate EPA regional office (the Office of Prevention, Pesticides and Toxic Substances Branch) and obtain guidance for appropriate cleanup measures in the shortest possible time after discovery, but in no case later than 24 hours after discovery.
- (ii) Where a spill directly contaminates grazing lands or vegetable gardens, as discussed under § 761.120(d), the responsible party shall notify the appropriate EPA regional office (the Office of Prevention, Pesticides and Toxic Substances Branch) and proceed

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Quality Assurance Manual

TestAmerica Dayton 4738 Gateway Circle Dayton, OH 45440 Phone No. 937-294-6856 Fax No. 937-499-1249

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Document No. DT-QAM-001

Revision No. 2

Effective Date: 05/18/12

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V				
Title Page:				
Quality Assurance Manual Approval Signatures				
Laboratory Director – Tara Schlenker	05/08/12 Date			
T				
Quality Assurance Manager – Violet Fanning	05/08/12 Date			
Technical Manager, (Metals) – Keith Hutchison	05/10/12 Date			
1294				
Technical Manager, (Organics) – Josh McKinney	Date Date			
Small Jaulick Technical Manager, (Wet Chemistry) – Ron Paulick	05/10/12 Date			
Jasm M. Yeurs H&S Officer – Jason Lykins	05/10/12 Date			
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